

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Vicious Brands, Inc.

(b) County of Residence of First Listed Plaintiff Washoe County

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

John Sullivan, Esq.

Blank Rome, LLP, One Logan Square, Phila., PA 19103

215-569-5703

DEFENDANTS

Stephanie Ochinnag and Jenneve McPherson

County of Residence of First Listed Defendant Clark County

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input checked="" type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C. §§1114, 1125

Brief description of cause:

Infringement of federally registered trademarks, false designation of origin**VII. REQUESTED IN COMPLAINT:**
☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See Instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

09/26/2017

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING FEE

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Vicious Brands, Inc. v. Ochinang et al

CIVIL ACTION

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

September 26, 2017

John Sullivan, Esq.

Vicious Brands, Inc.

Date

Attorney-at-law

Attorney for

215-569-5703

215-832-5703

jsullivan@blankrome.com

Telephone

FAX Number

E-Mail Address

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: Vicious Brands, Inc. - 1135 Terminal Way, Suite 209, Reno, Nevada 89502

Address of Defendant: Stephanie Ochintang - 8045 Greenbush Drive, Las Vegas, NV 89117; Jenneville McPherson - 2913 Bernardo Lane, Las Vegas, NV 89102

Place of Accident, Incident or Transaction: _____
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
(Please specify) Trademark

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases
(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, John Sullivan, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☒ Relief other than monetary damages is sought.

DATE: 9/26/17

Attorney-at-Law

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

309150

Attorney I.D.#

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 9/26/17

Attorney-at-Law

309150

Attorney I.D.#

**Civil Justice Expense and Delay Reduction Plan
Section 1:03 - Assignment to a Management Track**

- (a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.
- (b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management or Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.
- (c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.
- (d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.
- (e) Nothing in this Plan is intended to supersede Local Civil Rules 40.1 and 72.1, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS
(See §1.02 (e) Management Track Definitions of the
Civil Justice Expense and Delay Reduction Plan)**

Special Management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such cases as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions or potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VICIOUS BRANDS, INC.,	:	
	:	
Plaintiff,	:	CASE NO.
	:	
v.	:	
	:	JURY TRIAL DEMANDED
STEPFANIE OCHINANG and JENNEVIVE	:	
MCPHERSON,	:	
	:	
Defendants.	:	

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF; JURY TRIAL DEMAND**

Vicious Brands, Inc. (“VBI”), by and through its undersigned attorneys, files this civil action against Stepfanie Ochinang and Jenneville McPherson (collectively, “Defendants”), who are together doing business under the name “SAINTS + SINNERS”, as follows:

THE PARTIES

1. Vicious Brands, Inc. is a corporation organized and existing under the laws of the State of Nevada, with a registered corporate address at 1135 Terminal Way, Suite 209, Reno, Nevada 89502.
2. Upon information and belief, Stepfanie Ochinang is an individual residing at 8045 Greenbush Drive, Las Vegas, Nevada 89117.
3. Upon information and belief, Jenneville McPherson is an individual residing at 2913 Bernardo Lane, Las Vegas, Nevada 89102.

4. Upon information and belief, Stephanie Ochinang and Jenneville McPherson jointly conduct business under the name “SAINTS + SINNERS,” with their principal place of business at 2913 Bernardo Lane, Las Vegas, Nevada 89102.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338 because this case involves trademarks and arises under the laws of the United States, *inter alia*, 15 U.S.C. §§ 1114, 1117 and 1125.

6. This Court also has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367 as the state law claims are so related to the claims falling within this Court’s original jurisdiction that they form part of the same case or controversy under Article III of the Constitution of the United States.

7. This Court has personal jurisdiction over Defendants because, *inter alia*, Defendants transact business within and have availed themselves of this forum; contract to sell goods and render services within the forum, both through traditional means and through the Internet; engage in a persistent course of conduct in this forum; expect, or should reasonably expect, their acts to have legal consequences in this forum; and maintain substantial, systematic and continuous minimum contacts in this forum.


8. Venue is proper in this Court and this judicial district pursuant to 28 U.S.C. § 1391 because a substantial part of the events or omissions giving rise to the claims occurred in this jurisdiction.

FACTS COMMON TO ALL CLAIMS FOR RELIEF**Vicious Brands, Inc.'s Business and Marks**



9. VBI provides a broad range of hair care preparation products to customers throughout the United States, including through major distributors operating major sales operations in Pennsylvania, under its popular trademark SAINTS & SINNERS® and corresponding logo:



10. VBI owns numerous federal trademark registrations and active applications for its SAINTS & SINNERS-formative marks, including the following (collectively, the “VBI Marks”):

Mark/ Name/ Serial No./ Registration No.	Status/Key Dates	Goods/Services	Owner Information
SAINTS & SINNERS RN: 5088542 SN: 86980615	Registered: November 22, 2016 Filed: July 23, 2015	(Int'l Class: 03) hair care products, namely, shampoos, conditioners, and styling/finishing preparations	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502
SS SAINTS & SINNERS and Design  SAINTS — & — SINNERS RN: 5097386 SN: 86980612	Registered: December 6, 2016 Filed: December 14, 2015	(Int'l Class: 03) hair care products, namely, shampoos, conditioners, and styling/finishing preparations	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502

Mark/ Name/ Serial No./ Registration No.	Status/Key Dates	Goods/Services	Owner Information
SAINTS & SINNERS VELVET DIVINE MOISTURE SHAMPOO RN: 5083802 SN: 86923554	Registered: November 15, 2016 Filed: February 29, 2016	(Int'l Class: 03) shampoos	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502
SAINTS & SINNERS VELVET DIVINE HAIR MASQUE RN: 5092908 SN: 86910540	Registered: November 29, 2016 Filed: February 17, 2016	(Int'l Class: 03) hair care products, namely, non- medicated deep conditioning treatment for hair for cosmetic purposes	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502
SAINTS & SINNERS DIVINE DRY TEXTURE SPRAY SN: 87236938	Filed: November 15, 2016	(Int'l Class: 03) hair styling product, namely, a hair spray and finishing preparation	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502
SAINTS & SINNERS VELVET DIVINE DAILY CONDITIONER SN: 86910521	Filed: February 17, 2016	(Int'l Class: 03) hair conditioners	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502
SAINTS & SINNERS VELVET DIVINE LEAVE-IN CONDITIONER SN: 86848771	Filed: December 14, 2015	(Int'l Class: 03) hair care products, namely, a leave-in conditioning and styling preparation	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502

Mark/ Name/ Serial No./ Registration No.	Status/Key Dates	Goods/Services	Owner Information
SAINTS & SINNERS VELVET DIVINE STYLING POTION SN: 86848785	Filed: December 14, 2015	(Int'l Class: 03) hair care products, namely, a leave-in conditioning and styling preparation	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502
SS SAINTS & SINNERS and Design  SN: 86848702	Filed: December 14, 2015	(Int'l Class: 03) skin care products, namely, moisturizers for hands, face and body	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502
SS SAINTS & SINNERS and Design  SN: 87563559	Filed: August 10, 2017	(Int'l Class: 03) hair care products, namely, shampoos, conditioners, and styling/finishing preparations; skin care products, namely, moisturizers for hands, face and body	Vicious Brands Inc. (NEVADA CORP.) 1135 Terminal Way, Suite 209 Reno, NV 89502

True and correct copies of the trademark registrations and applications for the VBI Marks are attached as Exhibit "A".

11. VBI has used and continues to use the registered VBI Marks in connection with hair care preparations since at least as early as August 25, 2016.

12. VBI has also used and continues to use the VBI Marks in connection with clothing and apparel items, including, but not limited to, hats, tank tops, shirts, and bandanas.

13. VBI has used and continues to use the VBI Marks on social media, including, but not limited to, Facebook®, Instagram®, and Twitter®.

14. VBI maintains priority rights in the VBI Marks and is the owner of all right, title and interest to the VBI Marks and to the related federal trademark applications and registrations.

15. VBI has expended substantial financial resources developing, exhibiting, promoting, marketing and selling hair care and skin care preparations, along with apparel items and related goods, under the VBI Marks. As a result of VBI's nationwide promotional activities under the VBI Marks, its adherence to the highest standards of quality control, and widespread media attention, the distinctive VBI Marks have become widely recognized by the public and the trade throughout the United States. See <<https://www.realsaintsandsinners.com/>>.

Defendants' Unauthorized Use of the VBI Marks

16. Defendants are offering products using the "SINNERS + SAINTS" mark on Instagram® (@SINNERSANDSAINTSOFFICIAL) and on an active website available at <<https://www.shopsinnersandsaints.com/>>. Upon information and belief, Defendants created their Instagram® account (@SINNERSANDSAINTSOFFICIAL) approximately one week **after** VBI's website (<https://www.realsaintsandsinners.com/>) went live. Copies of printouts of Defendants' Instagram® page and website homepage are attached hereto as Exhibit B.

17. Through at least their Instagram® account and website as shown in Exhibit B, Defendants have purported to distribute and offer for sale goods that are the same or similar to those used in connection with, and protected under, VBI's Marks and that travel under similar channels of trade. Such goods include, but are not limited to, apparel and fashion-related products.

18. Through adoption and use of the SINNERS + SAINTS mark, and similar variations thereof, Defendants have blatantly pirated VBI's Marks in an attempt to illegitimately

draft off of the goodwill associated with VBI's high-quality hair care preparations, apparel products, and related goods.

19. On their Instagram® account, Defendants are using the exact same words, in the same font, with a black circle, and two lines separating the words as VBI's registered logo:

Defendants' Instagram® Account Profile



VBI's Instagram® Account Profile



20. On or about August 10, 2017, VBI, through its attorneys, submitted a complaint of trademark infringement to the private registry proxy for Defendants' website <shopsinnersandsaints.com>.

21. On or about August 10, 2017, and within hours of VBI's submission of its trademark infringement complaint to the proxy registrar associated with Defendants' website, Stephanie Ochintang contacted VBI by email and requested information regarding products offered for sale by VBI, in so doing fishing for detailed information pertaining to VBI's business and product development.

22. Upon information and belief, Stephanie Ochintang and her associates left four negative 1-star reviews of VBI's products on VBI's Facebook® page <www.facebook.com/realsaintsandsinners>. These are the only 1-star reviews VBI has ever received on its Facebook® page, and they were posted by Defendants to unfairly cause damage to VBI's business and the prestige of the products offered by VBI under VBI's Marks.

23. On or about August 14, 2017, VBI sent a cease and desist letter to Defendants again identifying VBI intellectual property rights and demanding that they cease all infringing activities, including their unauthorized use of VBI's Marks and all similar variations thereof, by no later than Friday, August 18, 2017. A copy of this letter is attached hereto as Exhibit C. To date, VBI has not received a response from Defendants to this August 14, 2017 letter.

24. On or about August 29, 2017, Defendants filed an application with the U.S. Patent & Trademark Office ("USPTO") to register the mark SAINTS + SINNERS in connection with goods identified as: "Hats; Pants; Shorts; T-shirts." The application was filed based on Defendants' alleged intent to use the mark in U.S. interstate commerce, and was assigned Serial No. 87/588,544 (hereinafter "the '544 Application") by the USPTO. A copy of the application as filed by Defendants with the USPTO is attached as Exhibit D.

25. Defendants adopted the SAINTS + SINNERS mark, and similar variations thereof, in connection with commercial activities in the United States with full knowledge that VBI is the exclusive owner of the distinctive and widely known VBI Marks.

26. All such uses by Defendants were made in order to falsely associate Defendants' goods and services with VBI when, in fact, no such association exists or has ever been authorized.

27. Given the confusing similarity of the trademarks at issue, reasonable ordinary consumers will mistakenly believe that Defendants' goods and services are sponsored, authorized, or otherwise approved by VBI, when in fact they are not.

28. By reason of VBI's prior rights in and to the distinctive and widely known VBI Marks, Defendants' use of SINNERS + SAINTS, and similar variations thereof, in their trademarks, service marks and trade names is likely to cause confusion and mistake in the minds

of the purchasing public, and tends to and does falsely create the impression that Defendants' goods and services are provided, sponsored or licensed by VBI, or are otherwise affiliated with or authorized by VBI. Defendant has further compounded such confusion by filing the '544 Application in bad faith to register the transposed name SAINTS + SINNERS, which identically mirrors VBI's Marks in terms of overall appearance, phonetics, and the precise ordering of the terms "saints" and "sinners."

29. Defendants' unauthorized conduct constitutes, amongst other causes of action, federal and common law trademark infringement and false designation of origin, commercial disparagement, and tortious interference with existing and prospective business relations, and causes VBI to suffer irreparable injuries for which it has no adequate remedy at law.

COUNT I
**[VIOLATION OF § 32 OF THE LANHAM ACT, 15 U.S.C. § 1114;
INFRINGEMENT OF A FEDERALLY REGISTERED TRADEMARK]**

30. The allegations of paragraphs 1 through 29 are incorporated by reference herein.

31. Defendants have been and still are infringing VBI's Marks pursuant to section 32 of the Lanham Act, 15 U.S.C. § 1114, by the unauthorized use of SINNERS and SAINTS as the dominant portion of Defendants' SINNERS + SAINTS mark which is used in the advertising, promotion, marketing, offering for sale and sale of apparel items, fashion accessories, and related beauty products in the United States, which acts have caused a likelihood of confusion, mistake or deception to consumers, prospective purchasers and the trade as to the source of Defendants' goods and services, believing them to emanate from VBI, or as being authorized, sponsored or approved by VBI, thus impairing the valuable goodwill symbolized by the VBI Marks.

32. Defendants have knowingly and willfully infringed the VBI Marks.

33. Defendants' actions infringing VBI's rights in the VBI Marks have caused and will continue to cause great injury and damage to VBI and VBI's goodwill, which injury and damage cannot be adequately quantified.

34. As a result of Defendants' conduct, VBI has suffered and continues to suffer irreparable damage, and unless this Court enjoins Defendants from further commission of such acts of infringement, VBI will have no adequate remedy at law.

COUNT II
[VIOLATION OF LANHAM ACT, 15 U.S.C. § 1125(A); FALSE DESIGNATION OF ORIGIN, FALSE DESCRIPTION AND FALSE REPRESENTATION]

35. The allegations of paragraphs 1 through 34 are incorporated by reference herein.

36. Defendants have been and still are engaging in false designation of origin and false representation under section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), by the unauthorized use of SINNERS and SAINTS as the dominant portion of Defendants' SINNERS + SAINTS mark which is used in the advertising, promotion, marketing, offering for sale and sale of apparel items, fashion accessories, and related beauty products in the United States, which acts have caused a likelihood of confusion, mistake or deception to consumers, prospective purchasers and the trade as to the source of Defendants' goods and services, believing them to emanate from VBI, or as being authorized, sponsored or approved by VBI, thus impairing the valuable goodwill symbolized by the VBI Marks.

37. Defendants' deliberate and wrongful acts of false designation of origin and false representation have caused and will continue to cause great injury and damage to VBI and to VBI's goodwill, which injury and damage cannot be adequately quantified.

38. As a result of Defendants' conduct, VBI has suffered and continues to suffer irreparable damage, and unless this Court enjoins Defendants from further commission of such

acts of false designation of origin and false representation, VBI will have no adequate remedy at law.

COUNT III
[COMMON LAW TRADEMARK INFRINGEMENT]

39. The allegations of paragraphs 1 through 38 are incorporated by reference herein.

40. Defendants' use of the confusingly similar SINNERS + SAINTS mark is likely to cause confusion to consumers, prospective purchasers and the trade as to the source or origin of the goods and services of Defendants.

41. Defendants' actions infringing VBI's rights in the VBI Marks have caused and will continue to cause great injury and damage to VBI, and VBI's goodwill, which injury and damage cannot be adequately quantified.

42. As a result of Defendants' infringing conduct, VBI has suffered and continues to suffer irreparable damage, and unless this Court enjoins Defendants from further commission of such acts of unfair competition, VBI will have no adequate remedy at law.

COUNT IV
[VIOLATION OF THE TRADEMARK DILUTION REVISION ACT, 15 U.S.C. § 1125(C); DILUTION OF FAMOUS MARK AND INJURY TO BUSINESS REPUTATION]

43. The allegations of paragraphs 1 through 42 are incorporated by reference herein.

44. As a result of the successful efforts of VBI to advertise, promote and sell its goods and services throughout the United States in association with the VBI Marks, the VBI Marks have come to be strongly associated in the minds of consumers with VBI.

45. The VBI Marks are famous and distinctive within the meaning of 15 U.S.C. § 1125(c)(1) and the meaning of 15 U.S.C. § 1127.

46. Defendants' use of the SINNERS + SAINTS mark constitutes dilution in violation of the Trademark Dilution Revision Act, 15 U.S.C. § 1125(c)(1). This unlawful conduct was undertaken with full recognition and knowledge of VBI's prior use of the VBI Marks in the U.S., and commenced after such VBI Marks had become famous.

47. VBI is informed and believes, and on that basis alleges, that Defendants' unlawful conduct was undertaken with the intent to blur or tarnish VBI's reputation and the valuable goodwill associated with the VBI Marks.

48. This conduct is likely to dilute the distinctive quality of the VBI Marks by lessening their capacity to identify and distinguish VBI's goods and services.

49. Defendants' deliberate and wrongful acts of dilution have caused and will continue to cause great injury and damage to VBI and to VBI's goodwill, which injury and damage cannot be adequately quantified.

50. As a result of Defendants' conduct, VBI has suffered and continues to suffer irreparable damage, and unless this Court enjoins Defendants from such further acts of dilution, VBI will have no adequate remedy at law.

COUNT V
[VIOLATION OF PENNSYLVANIA TRADEMARK ACT, 54 PA. CONS. STAT. ANN. § 1124; DILUTION]

51. The allegations of paragraphs 1 through 50 are incorporated by reference herein.

52. As a result of the successful efforts of VBI and its predecessors to advertise, promote, and sell their goods and services in Pennsylvania in association with the VBI Marks, the VBI Marks have come to be strongly associated in the minds of consumers with VBI.

53. The VBI Marks are famous and distinctive within the meaning of Pennsylvania law under 54 Pa. Cons. Stat. Ann. § 1124.

54. Defendants' use of the SINNERS + SAINTS mark constitutes dilution in violation of the Pennsylvania Trademark Act under 54 Pa. Cons. Stat. Ann. § 1124.

55. This unlawful conduct was undertaken with full recognition and knowledge of VBI's prior use of the VBI Marks, and commenced after such VBI Marks had become famous.

56. VBI is informed and believes, and on that basis alleges, that Defendants' unlawful conduct was undertaken with the intent to blur or tarnish VBI's reputation and the goodwill associated with the VBI Marks, whereby Defendants' unauthorized conduct has lessened the capacity of the VBI Marks to identify and distinguish VBI's goods and services.

57. This conduct has diluted, and is likely to cause dilution to, the distinctive quality of the VBI Marks by lessening their capacity to identify and distinguish VBI's goods and services.

58. Defendants' deliberate and wrongful acts of dilution have caused and will continue to cause great injury and damage to VBI and to VBI's goodwill, which injury and damage cannot be adequately quantified.

59. As a result of Defendants' conduct, VBI has suffered and continues to suffer irreparable damage, and unless this Court enjoins Defendants from such further acts of dilution, VBI will have no adequate remedy at law.

COUNT VI
[COMMON LAW UNFAIR COMPETITION]

60. The allegations of paragraphs 1 through 59 are incorporated by reference herein.

61. VBI is the exclusive owner of the VBI Marks. Goods and services offered under the VBI Marks are widely recognized as originating with VBI.

62. Defendants' use of the SINNERS + SAINTS mark is likely to cause confusion or to cause mistake among, or to deceive, consumers, prospective purchasers, and the trade.

63. VBI is informed and believes, and on that basis alleges, that Defendants' unlawful conduct was intended to misappropriate VBI's valuable goodwill.

64. Defendants' unlawful conduct constitutes unfair competition in violation of the common law.

65. Defendants' deliberate acts of unfair competition have caused and will continue to cause great injury and damage to VBI, and VBI's goodwill, which injury and damage cannot be adequately quantified.

66. As a result of Defendants' conduct, VBI has suffered and continues to suffer irreparable damage, and unless this Court enjoins Defendants from further commission of such acts of unfair competition, VBI will have no adequate remedy at law.

COUNT VII
[COMMERCIAL DISPARAGEMENT]

67. The allegations of paragraphs 1 through 66 are incorporated by reference herein.

68. Through *inter alia*, the acts complained of herein, Defendants made statements to consumers regarding VBI's products, including, at minimum, a series of negative and false reviews posted on VBI's Facebook® page.

69. Defendants' statements regarding VBI's products were false, misleading or fraudulent.

70. Defendants' statements regarding VBI and its product line were incorrect.

71. The statements were made in the presence of a third party that was not VBI. No privilege attached to any of the Defendants' statements.

72. Defendants either intended the publication of those statements to cause VBI to suffer pecuniary loss or reasonably should have foreseen or recognized that publication would result in pecuniary loss.

73. The publication of those statements has in fact resulted in VBI suffering direct pecuniary loss.

74. Defendants knew that the statements were false or acted in reckless disregard of its truth or falsity.

75. VBI has suffered actual damages as a direct and proximate result of Defendants' actions.

COUNT VIII
[TORTIOUS INTERFERENCE]

76. The allegations of paragraphs 1 through 75 are incorporated by reference herein.

77. By posting false, negative statements and reviews on VBI's social media pages, thereby contacting current and prospective VBI clients in writing, and informing them of false deficiencies in VBI's products, Defendants have and continue to tortiously interfere with VBI's contractual relationships.

78. Defendants' conduct was, and continues to be, improper and not privileged.

79. Defendants used wrongful means to effectuate its interference with current and prospective VBI clients in that Defendants unlawfully acted for the purposes of misappropriating VBI's current and prospective business opportunities.

80. VBI has suffered and continues to suffer immediate, continuing and irreparable harm as a direct and proximate result of Defendants' willful, malicious, and tortious acts, including but not limited to, lost business opportunities.

COUNT IX
[UNJUST ENRICHMENT]

81. The allegations of paragraphs 1 through 80 are incorporated by reference herein.

82. Defendants' conduct in making false assertions in reviews posted on VBI's official social media pages, as well as Defendants' infringement and wholesale misappropriation of the VBI Marks for use in connection with its own products, have caused and likely will continue to cause customers and potential customers to be directed to Defendants' website and purchase Defendants' products instead of being directed towards VBI's products.

83. As a result of Defendants' false assertions and diversion of potential customers from VBI's products to Defendants' products and website, Defendants have been unjustly enriched, to VBI's loss. There is no justification for Defendants unjust enrichment.

84. Defendants' actions have caused, and will continue to cause, irreparable harm to VBI, and will continue to so harm VBI unless preliminarily and permanently enjoined. Furthermore, there is no available remedy at law sufficient to make VBI whole. Accordingly, VBI is entitled to restitution from Defendants for the unjust benefits Defendants have received as a result of its conduct.

COUNT X
[VIOLATION OF PENNSYLVANIA UNFAIR TRADE PRACTICES AND CONSUMER PROTECTION LAW, 73 P.S. § 201-1, *ET SEQ.*]

85. The allegations of paragraphs 1 through 84 are incorporated by reference herein

86. Defendants have used the SINNERS + SAINTS mark in connection with the advertisement, promotion, offer for sale, sale and distribution of goods and services that are not authorized by VBI, which uses cause a likelihood of confusion or misunderstanding as to the source, sponsorship, approval, or sponsorship of goods or services and a likelihood of confusion or misunderstanding as to the affiliation, connection, or association with, or sponsorship by, VBI.

87. Upon information and belief, Defendants have committed the foregoing acts with full knowledge that it is infringing upon VBI's rights.

88. Defendants' unlawful conduct constitutes willful and deceptive trade practices in violation of 73 P.S. § 201-1, *et seq.*

89. Defendants' willful and deceptive trade practices have caused and will continue to cause great injury and damage to VBI and VBI's goodwill, which injury and damage cannot be adequately quantified.

90. As a result of Defendants' conduct, VBI has suffered and continues to suffer irreparable damage, and unless this Court enjoins Defendants from further deceptive trade practices, VBI will have no adequate remedy at law.

RELIEF SOUGHT

WHEREFORE, VBI demands that:

A. Judgment be entered in favor of VBI and against Defendants as to each of the above Counts I - X;

B. Defendants pay damages incurred by VBI as a result of the unlawful acts perpetrated by Defendants;

C. An accounting be ordered to determine the profits realized by Defendants due to the unauthorized use of the VBI Marks;

D. Defendants pay three times such profits or damages, whichever is greater;

E. Defendants, and any of their officers, directors, agents, servants, employees, representatives, successors, assigns, attorneys, licensees, distributors and all persons in active concert or participation with Defendants, be enjoined from directly or indirectly:

i. using the VBI Marks, and using any confusingly similar designation, alone or in combination with other words, as a trademark, service mark, domain name, or trade name to identify, market, distribute, advertise, promote, to offer for sale or to provide any goods or services;

ii. otherwise infringing the VBI Marks;

iii. continuing acts of false designation of origin or unfair trade practices herein complained of, or doing any acts that may cause Defendants' goods or services to be mistaken for, confused with or passed off as VBI's goods or services;

iv. applying for or attempting to register with any governmental entity, including but not limited to the Commonwealth of Pennsylvania and the U.S. Patent and Trademark Office, any trademark or service mark consisting in whole or in part of the words "sinner" or "saints";

v. interfering with VBI's use and registration of its VBI Marks, including, but not limited to, marks registered with the U.S. Patent and Trademark Office;

vi. linking, associating or attempting to associate itself with any hair care and skin care preparations, apparel items, fashion accessories, and any other related goods bearing the VBI Marks; and

vii. posting or otherwise publishing false and disparaging reviews or comments on the Internet directed towards VBI, VBI's products and services, as well as VBI's officers, directors, employees, agents, affiliates, and any other person or entity related to VBI.

F. Defendants be directed to file with the U.S. Patent and Trademark Office within ten (10) days after issuance of an injunction, a voluntary withdrawal with prejudice of pending

U.S. Application Serial No. 87/588,544 for the mark SAINTS + SINNERS, and take any and all additional necessary steps to effect the full assignment of any remaining rights in and to the mark to VBI;

G. Defendants be directed to file with this Court and to serve on VBI, within ten (10) days after issuance of an injunction, a report in writing, under oath, setting forth in detail the manner and form in which Defendants have complied with the injunction;

H. Defendants be required to deliver up for destruction all goods, signs, literature, advertising and other materials bearing the VBI Marks or any name or mark, or colorable imitation thereof, that is confusingly similar thereto, used in connection with Defendants' goods or services;

I. Defendants be ordered to transfer to VBI any domain name and any social media accounts with usernames, URL addresses, and/or handles consisting, in whole or in part, of the VBI Marks;

J. Defendants be required to remove the name SINNERS + SAINTS and any confusingly similar name or mark from all websites, HTML code, metatags, search engine query terms and any other electronic communications hosts, links and devices;

K. Defendants be ordered to pay costs of this action, including attorneys' fees, incurred by VBI in connection with Defendants' willful acts of infringement, dilution, unfair competition, unjust enrichment, disparagement, tortious interference, and deceptive trade practices; and

L. Such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial by jury on all claims that may be tried before a jury.

Respectfully submitted,

BLANK ROME LLP

BY: 

John P. Sullivan

Timothy D. Pecsenty

Zachary A. Aria

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Philadelphia, PA 19103
(215) 569-5619

Attorneys for Plaintiff,
VICIOUS BRANDS, INC.

Dated: September 26, 2017

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>VICIOUS BRANDS, INC.,</p> <p style="text-align: center;">PLAINTIFF,</p> <p>V.</p> <p>STEFFANIE OCHINANG AND</p> <p>JENNEVIVE MCPHERSON,</p> <p style="text-align: center;">DEFENDANTS.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p>CIVIL ACTION NO.</p>
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**RULE 7.1 DISCLOSURE STATEMENT OF PLAINTIFF
VICIOUS BRANDS, INC.**

Vicious Brands, Inc. a nongovernmental party in the above-captioned action, does not have a parent corporation, and no publicly held corporation owns 10% or more of its stock.

Respectfully submitted,

BLANK ROME LLP

Dated: September 26, 2017

By: 

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

VICIOUS BRANDS, INC.,	:	
	:	
PLAINTIFF,	:	CIVIL ACTION NO.
	:	
V.	:	
	:	
STEPFANIE OCHINANG AND	:	
JENNEVIVE MCPHERSON,	:	
	:	
DEFENDANTS.	:	

CERTIFICATE OF SERVICE

The undersigned certifies that Defendant's Rule 7.1 Disclosure Statement was filed with the Clerk of the Court and is available for viewing and downloading from the ECF system by all counsel of record.

Dated: September 26, 2017

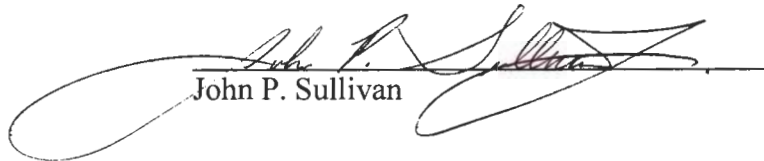

John P. Sullivan

EXHIBIT A

United States of America

United States Patent and Trademark Office

SAINTS & SINNERS

Reg. No. 5,088,542

Vicious Brands Inc. (NEVADA CORPORATION)
1135 Terminal Way, Suite 209
Reno, NV 89502

Registered Nov. 22, 2016

Int. Cl.: 3

CLASS 3: hair care products, namely, shampoos, conditioners, and styling/finishing preparations

Trademark

FIRST USE 8-25-2016; IN COMMERCE 8-25-2016

Principal Register

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 86-980,615, FILED 07-23-2015
JOHN B REGAN, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

United States of America

United States Patent and Trademark Office



Reg. No. 5,097,386

Registered Dec. 06, 2016

Int. Cl.: 3

Trademark

Principal Register

Vicious Brands Inc. (NEVADA CORPORATION)
1135 Terminal Way, Suite 209
Reno, NV 89502

CLASS 3: hair care products, namely, shampoos, conditioners, and styling/finishing preparations

FIRST USE 8-25-2016; IN COMMERCE 8-25-2016

The mark consists of two interlocking "S"'s with tapering lines radiating up and down from the point of intersection, all above the words "SAINTS & SINNERS" on three separate lines, with tapering lines radiating left and right from the "&".

SER. NO. 86-980,612, FILED 12-14-2015
JASON PAUL BLAIR, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

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- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

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United States of America

United States Patent and Trademark Office

SAINTS & SINNERS VELVET DIVINE MOISTURE SHAMPOO

Reg. No. 5,083,802

Registered Nov. 15, 2016

Int. Cl.: 3

Trademark

Principal Register

Vicious Brands Inc. (NEVADA CORPORATION)
1135 Terminal Way, Suite 209
Reno, NV 89502

CLASS 3: Shampoos

FIRST USE 8-25-2016; IN COMMERCE 8-25-2016

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown:
"MOISTURE SHAMPOO"

SER. NO. 86-923,554, FILED 02-29-2016
JUDITH MICHEL HELFMAN, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

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- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

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Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

United States of America

United States Patent and Trademark Office

SAINTS & SINNERS VELVET DIVINE HAIR MASQUE

Reg. No. 5,092,908

Vicious Brands Inc. (NEVADA CORPORATION)
1135 Terminal Way, Suite 209
Reno, NV 89502

Registered Nov. 29, 2016

Int. Cl.: 3

CLASS 3: Hair care products, namely, non-medicated deep conditioning treatment for hair for cosmetic purposes

Trademark

FIRST USE 8-25-2016; IN COMMERCE 8-25-2016

Principal Register

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

No claim is made to the exclusive right to use the following apart from the mark as shown:
"HAIR MASQUE"

SER. NO. 86-910,540, FILED 02-17-2016
JASON PAUL BLAIR, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*

What and When to File:

- **First Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.
- **Second Filing Deadline:** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 87236938

Filing Date: 11/15/2016

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	87236938
MARK INFORMATION	
*MARK	SAINTS & SINNERS DIVINE DRY TEXTURE SPRAY
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	SAINTS & SINNERS DIVINE DRY TEXTURE SPRAY
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font, style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Vicious Brands Inc.
INTERNAL ADDRESS	Suite 209
*STREET	1135 Terminal Way
*CITY	Reno
*STATE (Required for U.S. applicants)	Nevada
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants)	89502
LEGAL ENTITY INFORMATION	
TYPE	corporation
STATE/COUNTRY OF INCORPORATION	Nevada
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	003
*IDENTIFICATION	Hair styling product, namely a hair spray and finishing preparation
FILING BASIS	SECTION 1(b)
ATTORNEY INFORMATION	
NAME	Zachary A. Aria
ATTORNEY DOCKET NUMBER	145443-00100
FIRM NAME	Blank Rome LLP

INTERNAL ADDRESS	8th Floor
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP/POSTAL CODE	19103
PHONE	215-569-5347
FAX	215-832-5347
EMAIL ADDRESS	aria@blankrome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
OTHER APPOINTED ATTORNEY	Timothy D. Pecsénye, David M. Perry, Bruce D. George, Lisa Casey Spaniel, Megan E. Spitz, Steven M. Johnston, Jamie L. Tesfazion, Matthew A. Homyk, Bradford Craig, Shaun J. Bockert and Thomas H. Kelly
CORRESPONDENCE INFORMATION	
NAME	Zachary A. Aria
FIRM NAME	Blank Rome LLP
INTERNAL ADDRESS	8th Floor
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP/POSTAL CODE	19103
PHONE	215-569-5347
FAX	215-832-5347
*EMAIL ADDRESS	aria@blankrome.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS RF
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE DUE	275
*TOTAL FEE PAID	275
SIGNATURE INFORMATION	
SIGNATURE	/Michael A Wilson/
SIGNATORY'S NAME	Michael Wilson
SIGNATORY'S POSITION	Chief Executive Officer
SIGNATORY'S PHONE NUMBER	310-497-4691
DATE SIGNED	11/15/2016

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 87236938

Filing Date: 11/15/2016

To the Commissioner for Trademarks:

MARK: SAINTS & SINNERS DIVINE DRY TEXTURE SPRAY (Standard Characters, see [mark](#))

The literal element of the mark consists of SAINTS & SINNERS DIVINE DRY TEXTURE SPRAY.

The mark consists of standard characters, without claim to any particular font, style, size, or color.

The applicant, Vicious Brands Inc., a corporation of Nevada, having an address of

Suite 209

1135 Terminal Way

Reno, Nevada 89502

United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 003: Hair styling product, namely a hair spray and finishing preparation

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

The applicant's current Attorney Information:

Zachary A. Aria and Timothy D. Pecsénye, David M. Perry, Bruce D. George, Lisa Casey Spaniel, Megan E. Spitz, Steven M. Johnston, Jamie L. Tesfazion, Matthew A. Homyk, Bradford Craig, Shaun J. Bockert and Thomas H. Kelly of Blank Rome LLP

8th Floor

One Logan Square

Philadelphia, Pennsylvania 19103

United States

215-569-5347(phone)

215-832-5347(fax)

aria@blankrome.com (authorized)

The attorney docket/reference number is 145443-00100.

The applicant's current Correspondence Information:

Zachary A. Aria

Blank Rome LLP

8th Floor

One Logan Square

Philadelphia, Pennsylvania 19103

215-569-5347(phone)

215-832-5347(fax)

aria@blankrome.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or applicant's attorney at the e-mail address provided above. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in an additional processing fee of \$50 per international class of goods/services.

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration

The signatory believes that: if the applicant is filing the application under 15 U.S.C. § 1051(a), the applicant is the owner of the

trademark/service mark sought to be registered; the applicant is using the mark in commerce on or in connection with the goods/services in the application; the specimen(s) shows the mark as used on or in connection with the goods/services in the application; and/or if the applicant filed an application under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e), the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the goods/services in the application. The signatory believes that to the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive. The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Michael A Wilson/ Date: 11/15/2016

Signatory's Name: Michael Wilson

Signatory's Position: Chief Executive Officer

RAM Sale Number: 87236938

RAM Accounting Date: 11/15/2016

Serial Number: 87236938

Internet Transmission Date: Tue Nov 15 10:25:54 EST 2016

TEAS Stamp: USPTO/BAS-XX.XX.XXX.XX-20161115102554523

753-87236938-570c549acdc2e1bc8630aa30fba

c9891c39c5315224c419044f7a198f83f82793e-

CC-9660-20161114135638353340

SAINTS & SINNERS DIVINE DRY TEXTURE SPRAY

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.
 PTO Form 1478 (Rev 09/2006)
 OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 86910521

Filing Date: 02/17/2016

*NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	SAINTS & SINNERS VELVET DIVINE DAILY CONDITIONER
*STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	SAINTS & SINNERS VELVET DIVINE DAILY CONDITIONER
*MARK STATEMENT	The mark consists of standard characters, without claim to any particular font, style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Vicious Brands Inc.
*STREET	1135 Terminal Way, Suite 209
*CITY	Reno
*STATE (Required for U.S. applicants)	Nevada
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants)	89502
LEGAL ENTITY INFORMATION	
*TYPE	CORPORATION
* STATE/COUNTRY OF INCORPORATION	Nevada
GOODS AND/OR SERVICES AND BASIS INFORMATION	
* INTERNATIONAL CLASS	003
*IDENTIFICATION	Hair conditioners
*FILING BASIS	SECTION 1(b)
ADDITIONAL STATEMENTS SECTION	

*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS) (if applicable)	
*CONCURRENT USE CLAIM (if applicable)	
DISCLAIMER	No claim is made to the exclusive right to use DAILY CONDITIONER apart from the mark as shown.
ATTORNEY INFORMATION	
NAME	Nancy Benveniste Lamell
ATTORNEY DOCKET NUMBER	145443-00100
FIRM NAME	Blank Rome LLP
STREET	2029 Century Park East, Suite 600
CITY	Los Angeles
STATE	California
COUNTRY	United States
ZIP/POSTAL CODE	90067
PHONE	424-239-3859
FAX	424-239-3434
EMAIL ADDRESS	NLamell@BlankRome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
*NAME	Nancy Benveniste Lamell
FIRM NAME	Blank Rome LLP
*STREET	2029 Century Park East, Suite 600
*CITY	Los Angeles
*STATE (Required for U.S. addresses)	California
*COUNTRY	United States
*ZIP/POSTAL CODE	90067
PHONE	424-239-3859
FAX	424-239-3434
*EMAIL ADDRESS	NLamell@BlankRome.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS Plus
NUMBER OF CLASSES	1

FEE PER CLASS	225
* TOTAL FEE PAID	225
SIGNATURE INFORMATION	
* SIGNATURE	/Nancy B. Lamell/
* SIGNATORY'S NAME	Nancy Benveniste Lamell
* SIGNATORY'S POSITION	Attorney of record, California bar member
SIGNATORY'S PHONE NUMBER	424-239-3859
* DATE SIGNED	02/17/2016

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 86910521

Filing Date: 02/17/2016

To the Commissioner for Trademarks:

MARK: SAINTS & SINNERS VELVET DIVINE DAILY CONDITIONER (Standard Characters, see [mark](#))

The literal element of the mark consists of SAINTS & SINNERS VELVET DIVINE DAILY CONDITIONER.

The mark consists of standard characters, without claim to any particular font, style, size, or color.

The applicant, Vicious Brands Inc., a corporation of Nevada, having an address of

1135 Terminal Way, Suite 209

Reno, Nevada 89502

United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 003: Hair conditioners

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services. (15 U.S.C. Section 1051(b)).

Disclaimer

No claim is made to the exclusive right to use DAILY CONDITIONER apart from the mark as shown.

The applicant's current Attorney Information:

Nancy Benveniste Lamell of Blank Rome LLP 2029 Century Park East, Suite 600

Los Angeles, California 90067

United States

424-239-3859(phone)

424-239-3434(fax)

NLamell@BlankRome.com (authorized)

The attorney docket/reference number is 145443-00100.

The applicant's current Correspondence Information:

Nancy Benveniste Lamell

Blank Rome LLP

2029 Century Park East, Suite 600

Los Angeles, California 90067

424-239-3859(phone)

424-239-3434(fax)

NLamell@BlankRome.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or applicant's attorney at the e-mail address provided above. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in an additional processing fee of \$50 per international class of goods/services.

A fee payment in the amount of \$225 has been submitted with the application, representing payment for 1 class(es).

Declaration

The signatory believes that: if the applicant is filing the application under 15 U.S.C. § 1051(a), the applicant is the owner of the trademark/service mark sought to be registered; the applicant is using the mark in commerce on or in connection with the goods/services in the application; the specimen(s) shows the mark as used on or in connection with the goods/services in the application; and/or if the applicant filed an application under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e), the applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the goods/services in the application. The signatory believes that to the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive. The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Signature: /Nancy B. Lamell/ Date Signed: 02/17/2016
Signatory's Name: Nancy Benveniste Lamell
Signatory's Position: Attorney of record, California bar member

RAM Sale Number: 86910521
RAM Accounting Date: 02/18/2016

Serial Number: 86910521
Internet Transmission Date: Wed Feb 17 14:04:16 EST 2016
TEAS Stamp: USPTO/FTK-XXX.XX.XX.XXX-2016021714041680
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C-197-20160217135553076445

SAINTS & SINNERS VELVET DIVINE DAILY CONDITIONER

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 86848771

Filing Date: 12/14/2015

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	86848771
MARK INFORMATION	
*MARK	SAINTS & SINNERS VELVET DIVINE LEAVE-IN CONDITIONER
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	SAINTS & SINNERS VELVET DIVINE LEAVE-IN CONDITIONER
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font, style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Vicious Brands Inc.
*STREET	1135 Terminal Way, Suite 209
*CITY	Reno
*STATE (Required for U.S. applicants)	Nevada
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants)	89502
LEGAL ENTITY INFORMATION	
TYPE	corporation
STATE/COUNTRY OF INCORPORATION	Nevada
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	003
*IDENTIFICATION	hair care products, namely, a leave-in conditioning and styling preparation
FILING BASIS	SECTION 1(b)
ATTORNEY INFORMATION	
NAME	Nancy Benveniste Lamell
ATTORNEY DOCKET NUMBER	145443-00100
FIRM NAME	Blank Rome LLP

STREET	2029 Century Park East, Suite 600
CITY	Los Angeles
STATE	California
COUNTRY	United States
ZIP/POSTAL CODE	90067
PHONE	424-239-3859
FAX	424-239-3434
EMAIL ADDRESS	NLamell@BlankRome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
NAME	Nancy Benveniste Lamell
FIRM NAME	Blank Rome LLP
STREET	2029 Century Park East, Suite 600
CITY	Los Angeles
STATE	California
COUNTRY	United States
ZIP/POSTAL CODE	90067
PHONE	424-239-3859
FAX	424-239-3434
*EMAIL ADDRESS	NLamell@BlankRome.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS RF
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE DUE	275
*TOTAL FEE PAID	275
SIGNATURE INFORMATION	
SIGNATURE	/Nancy B. Lamell/
SIGNATORY'S NAME	Nancy Benveniste Lamell
SIGNATORY'S POSITION	Attorney of record, California bar member
SIGNATORY'S PHONE NUMBER	424-239-3859
DATE SIGNED	12/14/2015

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 86848771

Filing Date: 12/14/2015

To the Commissioner for Trademarks:

MARK: SAINTS & SINNERS VELVET DIVINE LEAVE-IN CONDITIONER (Standard Characters, see [mark](#))

The literal element of the mark consists of SAINTS & SINNERS VELVET DIVINE LEAVE-IN CONDITIONER.

The mark consists of standard characters, without claim to any particular font, style, size, or color.

The applicant, Vicious Brands Inc., a corporation of Nevada, having an address of
1135 Terminal Way, Suite 209
Reno, Nevada 89502
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 003: hair care products, namely, a leave-in conditioning and styling preparation

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

The applicant's current Attorney Information:

Nancy Benveniste Lamell of Blank Rome LLP 2029 Century Park East, Suite 600
Los Angeles, California 90067
United States
424-239-3859(phone)
424-239-3434(fax)
NLamell@BlankRome.com (authorized)

The attorney docket/reference number is 145443-00100.

The applicant's current Correspondence Information:

Nancy Benveniste Lamell
Blank Rome LLP
2029 Century Park East, Suite 600
Los Angeles, California 90067
424-239-3859(phone)
424-239-3434(fax)
NLamell@BlankRome.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or applicant's attorney at the e-mail address provided above. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in an additional processing fee of \$50 per international class of goods/services.

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration

The signatory believes that: if the applicant is filing the application under 15 U.S.C. § 1051(a), the applicant is the owner of the trademark/service mark sought to be registered; the applicant is using the mark in commerce on or in connection with the goods/services in the application; the specimen(s) shows the mark as used on or in connection with the goods/services in the application; and/or if the applicant filed an application under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e), the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the goods/services in the application. The signatory believes that to the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the

mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive. The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Nancy B. Lamell/ Date: 12/14/2015
Signatory's Name: Nancy Benveniste Lamell
Signatory's Position: Attorney of record, California bar member
RAM Sale Number: 86848771
RAM Accounting Date: 12/15/2015

Serial Number: 86848771
Internet Transmission Date: Mon Dec 14 18:13:00 EST 2015
TEAS Stamp: USPTO/BAS-XXX.XX.XX.XXX-2015121418130096
6091-86848771-550c5f41382cab5cc6af29bf98
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CC-5925-20151214180435162637

SAINTS & SINNERS VELVET DIVINE LEAVE-IN CONDITIONER

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 86848785

Filing Date: 12/14/2015

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	86848785
MARK INFORMATION	
*MARK	SAINTS & SINNERS VELVET DIVINE STYLING POTION
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	SAINTS & SINNERS VELVET DIVINE STYLING POTION
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font, style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Vicious Brands Inc.
*STREET	1135 Terminal Way, Suite 209
*CITY	Reno
*STATE (Required for U.S. applicants)	Nevada
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants)	89502
LEGAL ENTITY INFORMATION	
TYPE	corporation
STATE/COUNTRY OF INCORPORATION	Nevada
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	003
*IDENTIFICATION	hair care products, namely, a leave-in conditioning and styling preparation
FILING BASIS	SECTION 1(b)
ATTORNEY INFORMATION	
NAME	Nancy Benveniste Lamell
ATTORNEY DOCKET NUMBER	145443-00100
FIRM NAME	Blank Rome LLP
STREET	2029 Century Park East, Suite 600

CITY	Los Angeles
STATE	California
COUNTRY	United States
ZIP/POSTAL CODE	90067
PHONE	424-239-3859
FAX	424-239-3434
EMAIL ADDRESS	NLamell@BlankRome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
NAME	Nancy Benveniste Lamell
FIRM NAME	Blank Rome LLP
STREET	2029 Century Park East, Suite 600
CITY	Los Angeles
STATE	California
COUNTRY	United States
ZIP/POSTAL CODE	90067
PHONE	424-239-3859
FAX	424-239-3434
*EMAIL ADDRESS	NLamell@BlankRome.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS RF
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE DUE	275
*TOTAL FEE PAID	275
SIGNATURE INFORMATION	
SIGNATURE	/Nancy B. Lamell/
SIGNATORY'S NAME	Nancy Benveniste Lamell
SIGNATORY'S POSITION	Attorney of record, California bar member
SIGNATORY'S PHONE NUMBER	424-239-3859
DATE SIGNED	12/14/2015

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PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 86848785

Filing Date: 12/14/2015

To the Commissioner for Trademarks:

MARK: SAINTS & SINNERS VELVET DIVINE STYLING POTION (Standard Characters, see [mark](#))

The literal element of the mark consists of SAINTS & SINNERS VELVET DIVINE STYLING POTION.

The mark consists of standard characters, without claim to any particular font, style, size, or color.

The applicant, Vicious Brands Inc., a corporation of Nevada, having an address of
1135 Terminal Way, Suite 209
Reno, Nevada 89502
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 003: hair care products, namely, a leave-in conditioning and styling preparation

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

The applicant's current Attorney Information:

Nancy Benveniste Lamell of Blank Rome LLP 2029 Century Park East, Suite 600
Los Angeles, California 90067
United States
424-239-3859(phone)
424-239-3434(fax)
NLamell@BlankRome.com (authorized)

The attorney docket/reference number is 145443-00100.

The applicant's current Correspondence Information:

Nancy Benveniste Lamell
Blank Rome LLP
2029 Century Park East, Suite 600
Los Angeles, California 90067
424-239-3859(phone)
424-239-3434(fax)
NLamell@BlankRome.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or applicant's attorney at the e-mail address provided above. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in an additional processing fee of \$50 per international class of goods/services.

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration

The signatory believes that: if the applicant is filing the application under 15 U.S.C. § 1051(a), the applicant is the owner of the trademark/service mark sought to be registered; the applicant is using the mark in commerce on or in connection with the goods/services in the application; the specimen(s) shows the mark as used on or in connection with the goods/services in the application; and/or if the applicant filed an application under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e), the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the goods/services in the application. The signatory believes that to the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the

mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive. The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Nancy B. Lamell/ Date: 12/14/2015
Signatory's Name: Nancy Benveniste Lamell
Signatory's Position: Attorney of record, California bar member
RAM Sale Number: 86848785
RAM Accounting Date: 12/15/2015

Serial Number: 86848785
Internet Transmission Date: Mon Dec 14 18:22:46 EST 2015
TEAS Stamp: USPTO/BAS-XXX.XX.XX.XXX-2015121418224681
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SAINTS & SINNERS VELVET DIVINE STYLING POTION

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PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 86848702

Filing Date: 12/14/2015

The table below presents the data as entered.

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SERIAL NUMBER	86848702
MARK INFORMATION	
*MARK	\\TICRS\EXPORT16\IMAGEOUT16\868\487\86848702\xml1\RFA0002.JPG
SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	SS SAINTS & SINNERS
COLOR MARK	NO
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of two interlocking S's with tapering lines radiating up and down from the point of intersection, all in a circle of a contrasting color; the circle is above the words SAINTS & SINNERS on three separate lines, with tapering lines radiating left and right from the &.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	427 x 395
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Vicious Brands Inc.
*STREET	1135 Terminal Way, Suite 209
*CITY	Reno
*STATE (Required for U.S. applicants)	Nevada
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants)	89502
LEGAL ENTITY INFORMATION	
TYPE	corporation
STATE/COUNTRY OF INCORPORATION	Nevada
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	003
*IDENTIFICATION	hair care products, namely, shampoos, conditioners, and styling/finishing preparations; skin care products, namely, moisturizers for hands, face and body

FILING BASIS	SECTION 1(b)
ATTORNEY INFORMATION	
NAME	Nancy Benveniste Lamell
ATTORNEY DOCKET NUMBER	145443-00100
FIRM NAME	Blank Rome LLP
STREET	2029 Century Park East, Suite 600
CITY	Los Angeles
STATE	California
COUNTRY	United States
ZIP/POSTAL CODE	90067
PHONE	424-239-3859
FAX	424-239-3434
EMAIL ADDRESS	NLamell@BlankRome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
NAME	Nancy Benveniste Lamell
FIRM NAME	Blank Rome LLP
STREET	2029 Century Park East, Suite 600
CITY	Los Angeles
STATE	California
COUNTRY	United States
ZIP/POSTAL CODE	90067
PHONE	424-239-3859
FAX	424-239-3434
*EMAIL ADDRESS	NLamell@BlankRome.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS RF
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE DUE	275
*TOTAL FEE PAID	275
SIGNATURE INFORMATION	
SIGNATURE	/Nancy B. Lamell/
SIGNATORY'S NAME	Nancy Benveniste Lamell
SIGNATORY'S POSITION	Attorney of record, California bar member
SIGNATORY'S PHONE NUMBER	424-239-3859
DATE SIGNED	12/14/2015

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PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 86848702

Filing Date: 12/14/2015

To the Commissioner for Trademarks:

MARK: SS SAINTS & SINNERS (stylized and/or with design, see [mark](#))

The literal element of the mark consists of SS SAINTS & SINNERS.

The applicant is not claiming color as a feature of the mark. The mark consists of two interlocking S's with tapering lines radiating up and down from the point of intersection, all in a circle of a contrasting color; the circle is above the words SAINTS & SINNERS on three separate lines, with tapering lines radiating left and right from the &.

The applicant, Vicious Brands Inc., a corporation of Nevada, having an address of
1135 Terminal Way, Suite 209
Reno, Nevada 89502
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 003: hair care products, namely, shampoos, conditioners, and styling/finishing preparations; skin care products, namely, moisturizers for hands, face and body

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

The applicant's current Attorney Information:

Nancy Benveniste Lamell of Blank Rome LLP 2029 Century Park East, Suite 600
Los Angeles, California 90067
United States
424-239-3859(phone)
424-239-3434(fax)
NLamell@BlankRome.com (authorized)

The attorney docket/reference number is 145443-00100.

The applicant's current Correspondence Information:

Nancy Benveniste Lamell
Blank Rome LLP
2029 Century Park East, Suite 600
Los Angeles, California 90067
424-239-3859(phone)
424-239-3434(fax)
NLamell@BlankRome.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or applicant's attorney at the e-mail address provided above. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in an additional processing fee of \$50 per international class of goods/services.

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration

The signatory believes that: if the applicant is filing the application under 15 U.S.C. § 1051(a), the applicant is the owner of the

trademark/service mark sought to be registered; the applicant is using the mark in commerce on or in connection with the goods/services in the application; the specimen(s) shows the mark as used on or in connection with the goods/services in the application; and/or if the applicant filed an application under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e), the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the goods/services in the application. The signatory believes that to the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive. The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Nancy B. Lamell/ Date: 12/14/2015

Signatory's Name: Nancy Benveniste Lamell

Signatory's Position: Attorney of record, California bar member

RAM Sale Number: 86848702

RAM Accounting Date: 12/15/2015

Serial Number: 86848702

Internet Transmission Date: Mon Dec 14 17:36:39 EST 2015

TEAS Stamp: USPTO/BAS-XXX.XX.XX.XXX-2015121417363975

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S A I N T S

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S I N N E R S

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PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 87563559

Filing Date: 08/10/2017

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	87563559
MARK INFORMATION	
*MARK	\\TICRS\EXPORT17\IMAGEOUT17\875\635\87563559\xml1\RFA0002.JPG
SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	SS SAINTS & SINNERS
COLOR MARK	NO
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of two interlocking "S"'s with tapering lines radiating up and down from the point of intersection, all above the words "SAINTS & SINNERS" on three separate lines, with tapering lines radiating left and right from the "&". All of the aforementioned resides inside a filled in black circle.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	259 x 263
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Vicious Brands, Inc.
INTERNAL ADDRESS	Suite 209
*STREET	1135 Terminal Way
*CITY	Reno
*STATE (Required for U.S. applicants)	Nevada
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants)	89502
LEGAL ENTITY INFORMATION	
TYPE	corporation
STATE/COUNTRY OF INCORPORATION	Nevada
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	003
*IDENTIFICATION	hair care products, namely, shampoos, conditioners, and styling/finishing preparations; skin care products, namely,

	moisturizers for hands, face and body
FILING BASIS	SECTION 1(b)
ADDITIONAL STATEMENTS SECTION	
ACTIVE PRIOR REGISTRATION(S)	The applicant claims ownership of active prior U.S. Registration Number(s) 5097386, 5097396, 5088542, and others.
ATTORNEY INFORMATION	
NAME	Zachary A. Aria
ATTORNEY DOCKET NUMBER	145443-00100
FIRM NAME	Blank Rome LLP
INTERNAL ADDRESS	8th Floor
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP/POSTAL CODE	19103
PHONE	215-569-5347
FAX	215-832-5347
EMAIL ADDRESS	aria@blankrome.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
OTHER APPOINTED ATTORNEY	Timothy D. Pecsénye, David M. Perry, Bruce D. George, Lisa Casey Spaniel, Megan E. Spitz, John P. Sullivan, Jamie L. Tesfazion, Matthew A. Homyk, Bradford Craig, Shaun J. Bockert and Thomas H. Kelly
CORRESPONDENCE INFORMATION	
NAME	Zachary A. Aria
FIRM NAME	Blank Rome LLP
INTERNAL ADDRESS	8th Floor
STREET	One Logan Square
CITY	Philadelphia
STATE	Pennsylvania
COUNTRY	United States
ZIP/POSTAL CODE	19103
PHONE	215-569-5347
FAX	215-832-5347
*EMAIL ADDRESS	aria@blankrome.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS RF
NUMBER OF CLASSES	1

APPLICATION FOR REGISTRATION PER CLASS	275
*TOTAL FEE DUE	275
*TOTAL FEE PAID	275
SIGNATURE INFORMATION	
SIGNATURE	/Michael A. Wilson/
SIGNATORY'S NAME	Michael A. Wilson
SIGNATORY'S POSITION	Chief Executive Officer
SIGNATORY'S PHONE NUMBER	310-497-4691
DATE SIGNED	08/10/2017

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PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 87563559

Filing Date: 08/10/2017

To the Commissioner for Trademarks:

MARK: SS SAINTS & SINNERS (stylized and/or with design, see [mark](#))

The literal element of the mark consists of SS SAINTS & SINNERS.

The mark consists of two interlocking "S"'s with tapering lines radiating up and down from the point of intersection, all above the words "SAINTS & SINNERS" on three separate lines, with tapering lines radiating left and right from the "&". All of the aforementioned resides inside a filled in black circle.

The applicant, Vicious Brands, Inc., a corporation of Nevada, having an address of
Suite 209
1135 Terminal Way
Reno, Nevada 89502
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 003: hair care products, namely, shampoos, conditioners, and styling/finishing preparations; skin care products, namely, moisturizers for hands, face and body

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

Claim of Active Prior Registration(s)

The applicant claims ownership of active prior U.S. Registration Number(s) 5097386, 5097396, 5088542, and others.

The applicant's current Attorney Information:

Zachary A. Aria and Timothy D. Pecsénye, David M. Perry, Bruce D. George, Lisa Casey Spaniel, Megan E. Spitz, John P. Sullivan, Jamie L. Tesfazion, Matthew A. Homyk, Bradford Craig, Shaun J. Bockert and Thomas H. Kelly of Blank Rome LLP
8th Floor
One Logan Square
Philadelphia, Pennsylvania 19103
United States
215-569-5347(phone)
215-832-5347(fax)
aria@blankrome.com (authorized)

The attorney docket/reference number is 145443-00100.

The applicant's current Correspondence Information:

Zachary A. Aria
Blank Rome LLP
8th Floor
One Logan Square
Philadelphia, Pennsylvania 19103
215-569-5347(phone)
215-832-5347(fax)
aria@blankrome.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant, the applicant's attorney, or the applicant's domestic representative at the e-mail address provided in this application. I understand that a valid e-mail address

must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in the loss of TEAS Reduced Fee status and a requirement to submit an additional processing fee of \$125 per international class of goods/services.

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration

Basis:

If the applicant is filing the application based on use in commerce under 15 U.S.C. § 1051(a):

- The signatory believes that the applicant is the owner of the trademark/service mark sought to be registered;
- The mark is in use in commerce on or in connection with the goods/services in the application;
- The specimen(s) shows the mark as used on or in connection with the goods/services in the application; and
- To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

And/Or

If the applicant is filing the application based on an intent to use the mark in commerce under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e):

- The signatory believes that the applicant is entitled to use the mark in commerce;
- The applicant has a bona fide intention to use the mark in commerce on or in connection with the goods/services in the application; and
- To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

To the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive.

To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions made above have evidentiary support.

The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Michael A. Wilson/ Date: 08/10/2017

Signatory's Name: Michael A. Wilson

Signatory's Position: Chief Executive Officer

Payment Sale Number: 87563559

Payment Accounting Date: 08/11/2017

Serial Number: 87563559

Internet Transmission Date: Thu Aug 10 13:54:10 EDT 2017

TEAS Stamp: USPTO/BAS-XX.XX.XXX.XX-20170810135410471

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C-156-20170809162613666382



EXHIBIT B

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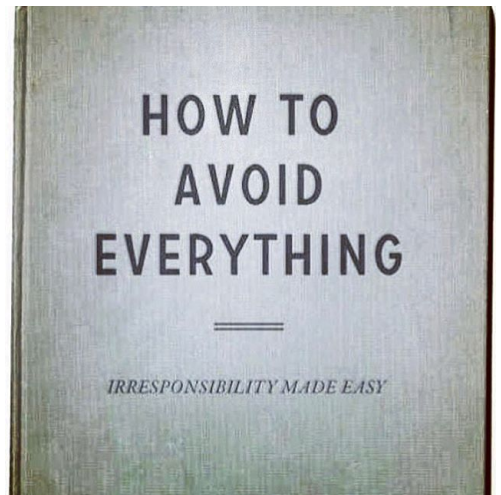
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15.2k followers

4,417 following

SINNERS + SAINTS pretty things // pretty dark things ☐ (online store coming soon...)
www.shopsinnersandsaints.com



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0



Blackbird Society IS NOW SINNERS + SAINTS

OUR ONLINE STORE IS STILL COMING SOON AND WILL BE BIGGER + BETTER THAN ANTICIPATED. (IT WILL BE WORTH THE WAIT, WE PROMISE!)

SINNERS + SAINTS IS THE VISION OF 2 FRIENDS WHO WERE TIRED OF BEING LABELED AS JUST ONE THING. WITH THIS, WE DECIDED TO CREATE A LIFESTYLE BRAND FOR THE BOLD + ARTISTIC. FOR THE SOULS WHO REFUSE TO FIT IN ONE BOX + INSIST ON COLORING OUTSIDE OF THE LINES. WE CREATED A LABEL THAT CANNOT BE LABELED, BUT IS ALL OF THE THINGS WE LOVE.

WE'RE PUNK ROCK FASHIONISTAS WITH REBEL ATTITUDES + WILD HEARTS WE ENJOY A NICE CUP OF TEA, BUT ARE FULLY OKAY WITH NOT BEING EVERYONE'S CUP OF TEA. WE'RE TOMBOYS WITH A CLOSET FULL OF HEELS. WE'LL ATTEND YOUR BLACK TIE AFFAIR, BUT WE'LL PROBABLY SHOW UP IN OUR FAVORITE BAND TEE.

TODAY WE ARE CREEPY, 90'S GRUNGE, OFF TO GET MANICURES (ALL BLACK). WHAT WILL WE BE TOMORROW? THAT HAS YET TO BE WRITTEN... WE'LL DECIDE WHEN WE WAKE UP IN THE MORNING.

Sign Up Here

TO BE NOTIFIED WHEN OUR
STORE OPENS

Follow Us

@SINNERSANDSAINTSOFFICIAL

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EXHIBIT C



Phone: (215) 569-5347
Fax: (215) 832-5347
Email: Aria@BlankRome.com



August 10, 2017

BY E-MAIL <shopsinnersandsaints.com@domainsbyproxy.com>



Re: SINNERS + SAINTS's Infringement of Vicious
Brands, Inc.'s SAINTS & SINNERS® Mark


Dear Sir or Madam:

This firm represents Vicious Brands, Inc. ("VBI") in connection with global intellectual property matters and have been consulted by VBI in connection with SINNERS + SAINTS's unauthorized and infringing use of trademarks confusingly similar to VBI's

proprietary marks SAINTS & SINNERS®,  and  (collectively, the "VBI Marks"). VBI takes great pride in its brands, and takes seriously the protection of its IP rights, including its trademarks.

As you likely know, VBI is the sole and exclusive owner of the

marks SAINTS & SINNERS®,  and  in connection with hair care and skin care preparations. VBI owns United States Trademark Registrations and Applications for the marks in connection with such goods since at least as early as August 25, 2016. Further,

VBI has used its logo, , on social media, including Facebook®, Twitter®, Instagram®, etc. since at least as early as August 15, 2016. VBI has also used its marks on clothing and apparel items, including t-shirts, bandanas, among other items. See attached. As a result of VBI's extensive use of its marks, the marks have acquired significant goodwill.

One Logan Square 18th & Cherry Streets Philadelphia, PA 19103

www.BlankRome.com

Boca Raton • Cincinnati • Houston • Los Angeles • New York • Philadelphia • Princeton • San Francisco • Shanghai • Tampa • Washington • Wilmington



SINNERS + SAINTS

August 10, 2017

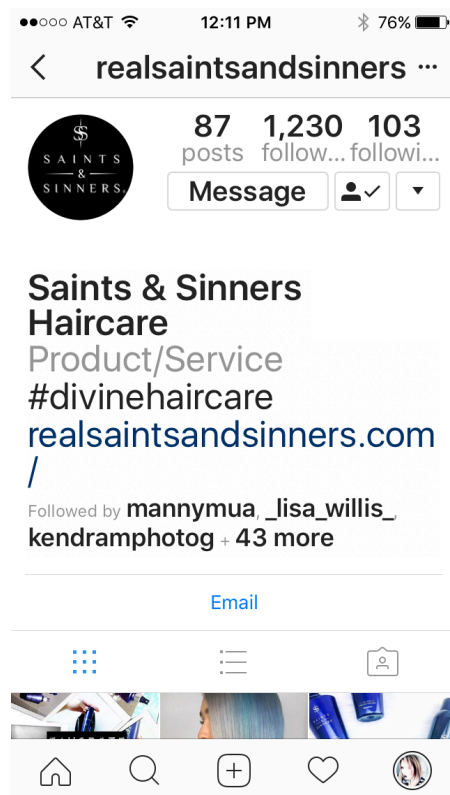
Page 2

It has recently come to our attention that SINNERS + SAINTS is offering products using the SINNERS + SAINTS mark on Instagram® and on the website available at <https://www.shopsinnersandsaints.com/>. See attached Instagram® and website printouts. SINNERS + SAINTS has purported to distribute and offer for sale goods that are the same or similar to those used in connection with, and protected under, VBI's Marks and that travel under similar channels of trade. As can be clearly seen below from the parties' social media pages, SINNERS + SAINTS is using the exact same words, in the same font, with a black circle, and two lines separating the words as VBI's logo.

SINNERS + SAINTS



VBI



As such, confusion is particularly likely here as a matter of U.S. law. Under these circumstances, U.S. courts routinely find a likelihood of confusion despite significant differences between the



SINNERS + SAINTS

August 10, 2017

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parties' goods or services. See, e.g. *Interpace Corp. v. Lapp, Inc.*, 721 F.2d 460, 463 (3d Cir. 1983) (reversing district court for failing to recognize possibility of infringement and confusion between "products [that] are not in fact competitive" where the marks at issue were identical); *American Plan Corp. v. State Loan & Finance Corp.*, 365 F.2d 635, 639 (3d Cir. 1966) ("Where the names are identical ... the names in themselves are evidence of likelihood of confusion."); see also *Kohler Co. v. Baldwin Hardware Corp.*, 82 U.S.P.Q.2d 1100, 2007 WL 117575 (T.T.A.B. 2007) (finding likelihood of confusion when identical marks used on senior user's plumbing fixtures and junior user's door hardware); *In re Concordia Int'l Forwarding Corp.*, 222 U.S.P.Q. 355, 1983 WL 51828 (T.T.A.B. 1983) (finding that where marks are very similar, it is "only necessary that there be a viable relationship between the goods or services in order to support a holding of likelihood of confusion"). Moreover, even assuming that SINNERS + SAINTS's motivation in adopting its "SINNERS + SAINTS" trademark was wholly innocent, it would be irrelevant to this analysis. See, e.g., *Lapp, Inc.*, 721 F.2d at 463 (reversing denial of a preliminary injunction against use of a mark by infringer with German parent company: "while it may have acted innocently, [it] was careless in not conducting a thorough name search for American uses of the name").

In view of the foregoing, the adoption and use of SINNERS + SAINTS mark violates VBI's rights in its trademarks and is likely to cause consumer confusion as to the source, sponsorship, or affiliation of the goods. Based on the manner of SINNERS + SAINTS's use, we have no hesitation in concluding that such use trades off the goodwill in VBI's Marks. SINNERS + SAINTS's use of its mark is clearly intended to reference VBI in the minds of consumers, and constitutes, at a minimum, unfair competition, and trademark infringement. SINNERS + SAINTS's activities further give rise to initial interest confusion, whereby the mark SINNERS + SAINTS is used by SINNERS + SAINTS to entice customers to visit VBI's online presence, only to be diverted to sites wholly unaffiliated with or sponsored by VBI. VBI will not tolerate any attempts to trade off its goodwill, or any unauthorized or implied associations between VBI's Marks and the goods and services of others.



SINNERS + SAINTS

August 10, 2017

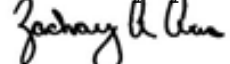
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We have advised VBI of the range of legal remedies available to protect its very valuable trademarks from infringement, wrongful appropriation, and unfair competition. VBI regards SINNERS + SAINTS's use of its mark as a very serious matter and will take appropriate steps to protect its rights. On behalf of VBI, we hereby make formal demand upon you to:

- 1) cease and desist immediately from any further use or plans to use the "SINNERS + SAINTS" mark, as well as any use of any other mark or name which is confusingly similar to the SAINTS & SINNERS mark including on any literature, search engine advertisements or "adwords", websites, or social media accounts;
- 2) provide written assurances by no later than Friday, August 18, 2017, that you will refrain from all such use and future uses;
- 3) contact us to discuss corrective emailing to each person who has signed up for the SINNERS + SAINTS mailing list through the <<https://www.shopsinnersandsaints.com/>> website; and
- 4) contact us to discuss the recall, recapture and destruction (to the satisfaction of VBI) of all literature or advertisements, promotional and marketing materials, including t-shirts, created or distributed by you which bear the SINNERS + SAINTS mark.

We look forward to a prompt response from you concerning this matter by Friday, August 18, 2017. If we do not receive a compliant response by that date, VBI will assume SINNERS + SAINTS's infringement is willful and will consider all further action under the law to protect its very valuable trademark.

Sincerely yours,


ZACHARY A. ARIA

Attachments

cc: Vicious Brands, Inc.



SINNERS + SAINTS

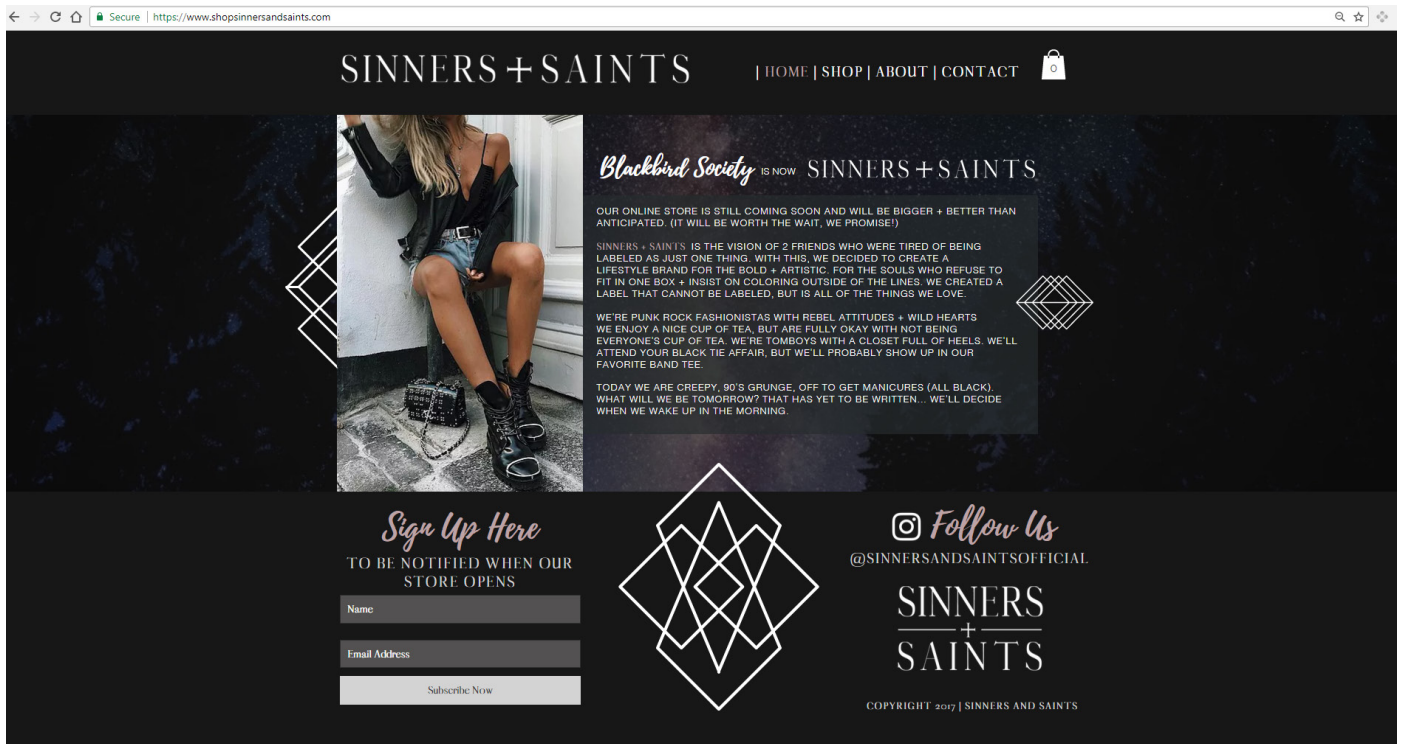
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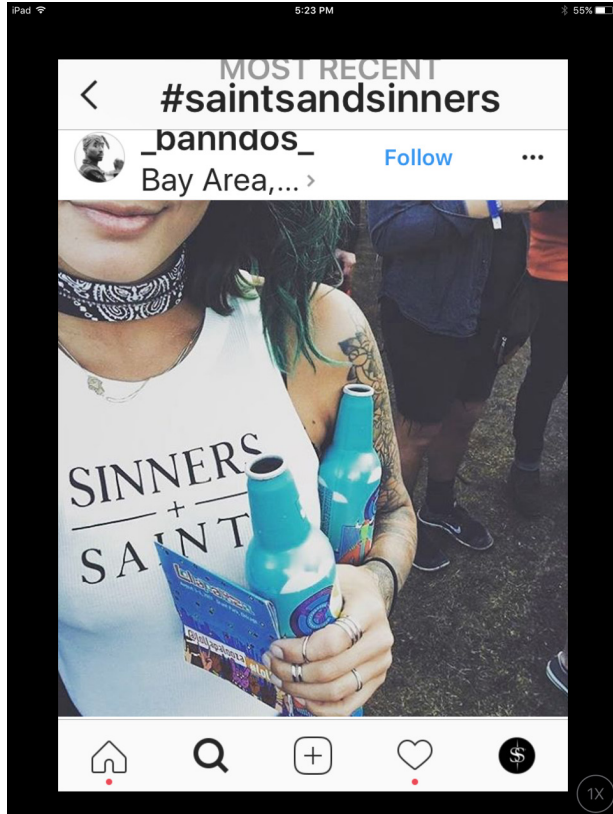
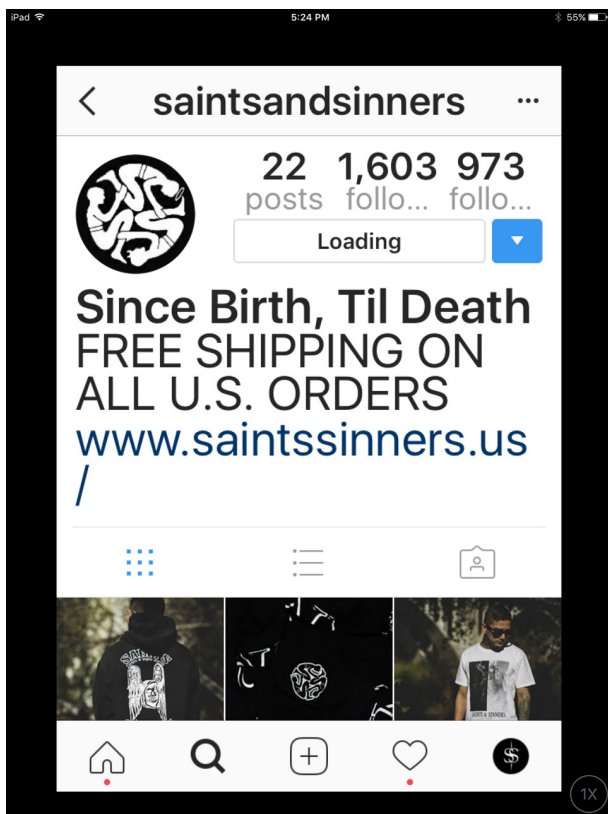


EXHIBIT D

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 87588544

Filing Date: 08/29/2017

NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	SAINTS + SINNERS
*STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	SAINTS + SINNERS
*MARK STATEMENT	The mark consists of standard characters, without claim to any particular font style, size, or color.
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	SAINTS + SINNERS
*STREET	2913 Bernardo Ln
*CITY	Las Vegas
*STATE (Required for U.S. applicants)	Nevada
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants)	89102
EMAIL ADDRESS	stephanie@blackfoxcreative.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
LEGAL ENTITY INFORMATION	
*TYPE	PARTNERSHIP
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nevada
NAME(S) OF GENERAL PARTNER(S) & CITIZENSHIP/INCORPORATION	Stephanie Ochinang (USA); Jenneville McPherson (USA)
GOODS AND/OR SERVICES AND BASIS INFORMATION	
* INTERNATIONAL CLASS	025
*IDENTIFICATION	Hats; Pants; Shorts; T-shirts

*FILING BASIS	SECTION 1(b)
ADDITIONAL STATEMENTS INFORMATION	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS) (if applicable)	
*CONCURRENT USE CLAIM (if applicable)	
CORRESPONDENCE INFORMATION	
*NAME	SAINTS + SINNERS
*STREET	2913 Bernardo Ln
*CITY	Las Vegas
*STATE (Required for U.S. addresses)	Nevada
*COUNTRY	United States
*ZIP/POSTAL CODE	89102
*EMAIL ADDRESS	stephanie@blackfoxcreative.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
APPLICATION FILING OPTION	TEAS Plus
NUMBER OF CLASSES	1
FEE PER CLASS	225
*TOTAL FEE PAID	225
SIGNATURE INFORMATION	
* SIGNATURE	/Stephanie Ochinang/
* SIGNATORY'S NAME	Stephanie Ochinang
* SIGNATORY'S POSITION	Partner
* DATE SIGNED	08/29/2017
* SIGNATURE	/Stephanie Ochinang/
* SIGNATORY'S NAME	Jennevive McPherson
* SIGNATORY'S POSITION	Partner
* DATE SIGNED	08/29/2017

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Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 87588544

Filing Date: 08/29/2017

To the Commissioner for Trademarks:

MARK: SAINTS + SINNERS (Standard Characters, see [mark](#))

The mark in your application is SAINTS + SINNERS.

The applicant, SAINTS + SINNERS, a partnership legally organized under the laws of Nevada, having as partner(s) Stephanie Ochintang (USA); Jenneville McPherson (USA), having an address of

2913 Bernardo Ln

Las Vegas, Nevada 89102

United States

stephanie@blackfoxcreative.com

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 025: Hats; Pants; Shorts; T-shirts

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services. (15 U.S.C. Section 1051(b)).

The applicant's current Correspondence Information:

SAINTS + SINNERS

2913 Bernardo Ln

Las Vegas, Nevada 89102

stephanie@blackfoxcreative.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant or the applicant's attorney, or the applicant's domestic representative at the e-mail address provided in this application. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in the loss of TEAS Plus status and a requirement to submit an additional processing fee of \$125 per international class of goods/services.

A fee payment in the amount of \$225 has been submitted with the application, representing payment for 1 class(es).

Declaration

Basis:

If the applicant is filing the application based on use in commerce under 15 U.S.C. § 1051(a):

- The signatory believes that the applicant is the owner of the trademark/service mark sought to be registered;
- The mark is in use in commerce on or in connection with the goods/services in the application;
- The specimen(s) shows the mark as used on or in connection with the goods/services in the application; and
- To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

AND/OR

If the applicant is filing the application based on an intent to use the mark in commerce under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e):

- The signatory believes that the applicant is entitled to use the mark in commerce;
- The applicant has a bona fide intention to use the mark in commerce on or in connection with the goods/services in the application; and
- To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

To the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive.

To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions made above have evidentiary support.

The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /Stephanie Ochintang/ Date: 08/29/2017

Signatory's Name: Stephanie Ochintang

Signatory's Position: Partner

Signature: /Stephanie Ochintang/ Date: 08/29/2017

Signatory's Name: Jenneville McPherson

Signatory's Position: Partner

Payment Sale Number: 87588544

Payment Accounting Date: 08/30/2017

Serial Number: 87588544

Internet Transmission Date: Tue Aug 29 17:06:46 EDT 2017

TEAS Stamp: USPTO/FTK-XXX.XX.XX.XX-20170829170646988

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SAINTS + SINNERS